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CINDY LOU ELLEN KOCH, KRYSTAL LEE CLARK, LA
BELLA VITA INTERNATIONAL EQUINE SALES, LLC, TW
INTERNATIONAL INVESTMENTS, LTD., LIQUID LUXURY
GROUP, LLC, AND BLACKSTONE LUXURY GROUP, LLC*

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LUCKY LAKE FARM & WATER LIMITED
PARTNERSHIP, a Saskatchewan Limited
Partnership; and SWIFT RIVER FARMS
LTD., an Alberta corporation;

Plaintiffs,
vs.

GORDON CLARK, an individual; RODNEY
KOCH A/K/A GORDON CLARK, an
individual; CINDY LOU ELLEN KOCH, an
individual; KRYSTAL LEE CLARK, an
individual; MICHAEL ROSE, an individual;
MICHAEL ROSE & ASSOCIATES
STRATEGIC CONSULTING INC., a Nova
Scotia corporation; JEFF HOUGHTON, an
individual; TW INTERNATIONAL
INVESTMENTS LTD., a Bahamian
Registered company; TW ADVISORS LTD.,
a British Virgin Islands registered company;
TW FUNDS INC., a British Virgin Islands
registered company; LA BELLA VITA
EQUESTRIANS LLC, a Nevada limited liability
company; LA BELLA VITA INTERNATIONAL
EQUINE SALES LLC, a Nevada limited-liability
company; LIQUID LUXURY GROUP LLC, a
Nevada limited liability company;
BLACKSTONE LUXURY GROUP LLC, a
Nevada limited liability company; DOES I-XX,
inclusive; and ROE CORPORATIONS, I-X,
inclusive,

Defendants.

Case No.: 2:23-cv-01768-GMN-MDC

**STIPULATION AND [PROPOSED]
ORDER EXTENDING
TIME FOR DEFENDANTS,
RODNEY KOCH, CINDY LOU ELLEN
KOCH, KRYSTAL LEE CLARK, LA
BELLA VITA INTERNATIONAL
EQUINE SALES, LLC, TW
INTERNATIONAL INVESTMENTS,
LTD., LIQUID LUXURY GROUP, LLC,
AND BLACKSTONE LUXURY GROUP,
LLC TO FILE RESPONSIVE
PLEADING TO FIRST AMENDED
COMPLAINT**

(Sixth Request)

1 Plaintiffs LUCKY LAKE FARM & WATER LIMITED PARTNERSHIP and SWIFT
2 RIVER FARMS LTD. and Defendants GORDON CLARK, RODNEY KOCH, CINDY LOU
3 ELLEN KOCH, KRYSTAL LEE CLARK, LA BELLA VITA INTERNATIONAL EQUINE
4 SALES, LLC, TW INTERNATIONAL INVESTMENTS, LTD., LIQUID LUXURY GROUP,
5 LLC, and BLACKSTONE LUXURY GROUP, LLC (collectively “Certain Defendants”¹), by
6 and through their respective counsel, hereby stipulate and agree to the following:
7

8 **PROCEDURAL BACKGROUND**

9 1. On December 5, 2023, Plaintiffs filed their First Amended Complaint (ECF 30).

10 2. On December 19, 2023, Plaintiffs and TRO Defendants filed a Stipulation and
11 [Proposed] Order Extending Time for Defendants Gordon Clark, Rodney Koch, Cindy Lou Ellen
12 Koch, and Krystal Lee Clark to File Answer to First Amended Complaint [First Request] (ECF
13 34) extending TRO Defendants’ time to answer the First Amended Complaint to January 9, 2024.
14 The Court filed the Order Extending Time for Defendants Gordon Clark, Rodney Koch, Cindy
15 Lou Ellen Koch, and Krystal Lee Clark to File Answer to First Amended Complaint on December
16 20, 2023 (ECF 35).
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18 3. On January 9, 2024, Plaintiffs and TRO Defendants filed a Stipulation and
19 [Proposed] Order Extending Time for Defendants Gordon Clark, Rodney Koch, Cindy Lou Ellen
20 Koch, and Krystal Lee Clark to File Answer to First Amended Complaint [Second Request] (ECF
21 37) extending TRO Defendants’ time to answer the First Amended Complaint to February 9,
22 2024. The Court filed the Order Extending Time for Defendants Gordon Clark, Rodney Koch,
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27 ¹ Defendants GORDON CLARK, RODNEY KOCH, CINDY LOU ELLEN KOCH, and KRYSTAL LEE CLARK
28 shall be referred to herein as “TRO Defendants.”

1 Cindy Lou Ellen Koch, and Krystal Lee Clark to File Answer to First Amended Complaint on
2 January 11, 2024 (ECF 38).

3 4. On February 1, 2024, Defendants LA BELLA VITA INTERNATIONAL
4 EQUINE SALES, LLC, TW INTERNATIONAL INVESTMENTS, LTD., LIQUID LUXURY
5 GROUP, LLC, and BLACKSTONE LUXURY GROUP, LLC (“Waiver Defendants”), filed
6 Waivers of Service (ECF 55-58), which were dated January 24, 2024. As such, Waiver
7 Defendants’ responsive pleadings to the First Amended Complaint (ECF 30) was due March 25,
8 2024.
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10 5. On March 20, 2024, Plaintiffs, TRO Defendants, and Waiver Defendants
11 executed and filed Stipulation and [proposed] Order Regarding Modifying Temporary
12 Restraining Order, Extending Temporary Restraining Order, and Extending Time for Defendants
13 Gordon Clark, Rodney Koch, Cindy Lou Ellen Koch, Krystal Lee Clark, La Bella Vita
14 International Equine Sales, LLC, TW International Investments, Ltd., Liquid Luxury Group,
15 LLC, and Blackstone Luxury Group, LLC to File Responsive Pleading to First Amended
16 Complaint (ECF 67) whereby the parties agreed to extend the TRO Defendants’ and Waiver
17 Defendants’ time to file a responsive pleading to the First Amended Complaint to May 24, 2024.
18 The Court filed that Order on March 22, 2024 (ECF 68).
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20 6. On May 29, 2024, Plaintiffs, TRO Defendants, and Waiver Defendants executed
21 and filed Stipulation and [proposed] Order Regarding Modifying Temporary Restraining Order,
22 Extending Temporary Restraining Order, and Extending Time for Defendants Gordon Clark,
23 Rodney Koch, Cindy Lou Ellen Koch, Krystal Lee Clark, La Bella Vita International Equine
24 Sales, LLC, TW International Investments, Ltd., Liquid Luxury Group, LLC, and Blackstone
25 Luxury Group, LLC to File Responsive Pleading to First Amended Complaint whereby the
26 parties agreed to extend the TRO Defendants’ and Waiver Defendants’ time to file a responsive
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1 pleading to the First Amended Complaint to July 23, 2024. The Court filed that Order on May
2 29, 2024 (ECF 70).

3 7. On July 29, 2024, Plaintiffs, TRO Defendants, and Waiver Defendants executed
4 and filed Stipulation and [proposed] Order Extending Time for Defendants Gordon Clark,
5 Rodney Koch, Cindy Lou Ellen Koch, Krystal Lee Clark, La Bella Vita International Equine
6 Sales, LLC, TW International Investments, Ltd., Liquid Luxury Group, LLC, and Blackstone
7 Luxury Group, LLC to File Responsive Pleading to First Amended Complaint (ECF 74) whereby
8 the parties agreed to extend the TRO Defendants' and Waiver Defendants' time to file a
9 responsive pleading to the First Amended Complaint to August 6, 2024. The Court filed that
10 Order on July 31, 2024 (ECF 75).

12 STIPULATION

13 8. The parties have been actively engaged in settlement discussions, which has
14 resulted in a signed settlement agreement that requires the continued good faith efforts of the
15 parties. Pursuant to a General Settlement Agreement and Mutual Release of Claims ("Settlement
16 Agreement"), dated December 26, 2023, between Plaintiffs and Certain Defendants, the parties
17 agreed to take certain steps to resolve this matter, including marketing and selling the Desert
18 Flora Property and Luna View Property, which are identified in the Temporary Restraining
19 Order. With the parties working together, on or about February 15, 2024, the Luna View Property
20 was sold. Further, the Desert Flora Property was sold on July 19, 2024. After the sale of the two
21 Properties, there still exists an obligation due from Certain Defendants to Plaintiff.

22 9. The Settlement Agreement provides an additional amount of time for Certain
23 Defendants to pay any remaining obligation following the sale of the two Properties. That
24 deadline is October 17, 2024.
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10. In light of the obligation deadline, the parties further stipulate and agree to extend the time for Certain Defendants to file their responsive pleading to Plaintiff's First Amended Complaint to three business (3) days following the obligation deadline or until October 22, 2024.

11. This is the sixth request of the parties to extend the responsive pleading deadline of TRO Defendants and the fourth request for Waiver Defendants.

12. The parties continue to move forward with the terms of the Settlement Agreement in good faith, and therefore agree to these additional extensions.

This Stipulation is made in good faith and for good cause and not for any purpose of delay or harm.

Dated this 5th day of August, 2024.

Dated this 5th day of August, 2024.

ALDRICH LAW FIRM, LTD.

FLYNN GIUDICI, PLLC

/s/ John P. Aldrich

/s/ Shamus S. Flynn

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INVESTMENTS, LTD., LIQUID LUXURY

GROUP, LLC, AND BLACKSTONE

LUXURY GROUP, LLC

ORDER

The *Stipulation for Extension of Time* (ECF No. 76) is GRANTED. The parties' stipulation represents the parties have settled. The parties must file a "Notice of Settlement" by August 12, 2024."

IT IS SO ORDERED.



Hon. Maximiliano D. Couvillier III
United States Magistrate Judge

Date: 8/7/2024